

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMIRI CURRY, individually and on behalf of)
all others similarly situated,)
)
Plaintiff,)
) Case No. 07-C-6149
v.)
) Judge Charles R. Norgle
)
J.P MORGAN CHASE & CO.; CHASE)
INVESTMENT SERVICES CORP.; and DOES)
1 through 10, inclusive,)
)
Defendants.)
)

JOINT MOTION TO STAY PROCEEDINGS

Parties Plaintiff Amiri Curry (“Plaintiff”) and Defendants JPMorgan Chase & Co. and Chase Investment Services Corp (“Defendants”), by their attorneys, move to stay all proceedings in this matter for an additional period of 21 days while the parties continue to engage in settlement discussions. At the conclusion of the 21-day period, the parties would then report back to the Court on their progress and either (1) request an additional stay so that they can continue to pursue settlement discussions, or (2) submit a schedule for the completion of briefing on the pending motion to dismiss. In support of their Motion, parties state as follows:

1. On October 31, 2007, Plaintiff filed a Complaint against Defendants in Northern District of Illinois, Eastern Division, Case No. 07-C-6149 (the “Complaint”).
2. On January 22, 2007, Defendants filed a Motion to Dismiss or Strike Pursuant to Fed. R. Civ. P. 12. Defendants also filed their Answer to Plaintiff’s Complaint.
3. On February 15, 2007, Plaintiffs responded to the Defendants’ Motion to Dismiss.

4. On February 27, 2008, the parties jointly moved for a 30-day stay of the matter so that they could engage in discussions aimed at resolving the matter. In that motion, the parties also requested that the deadline for Defendants' Reply in Support of their Motion to Dismiss be reset to seven days after the stay is lifted, though and including April 4, 2008.

5. On February 28, 2008, the Court granted the parties' motion.

6. The aforementioned 30-day stay expired on March 28, 2008 and, as a result, Defendants' Reply in Support of their Motion to Dismiss is currently due April 4, 2008.

7. The parties are continuing to engage in discussions aimed at resolving the case and agree that an additional 21-day stay of the proceedings (through and including April 25, 2008) will benefit these discussions and permit the parties to determine whether or not additional discussions are sufficiently likely to result in a resolution of the case to warrant their continuance to conclusion.

8. At the conclusion of the 21-day period, the parties will report to the Court on their progress and either (1) request an additional stay so that they can continue to pursue settlement discussions, or (2) submit a schedule for the completion of briefing on the pending motion to dismiss.

9. The requested stay of the proceedings will not cause excessive delay in the litigation and will not unduly prejudice any party.

WHEREFORE, the Parties respectfully request the Court grant their Joint Motion to Stay Proceedings.

Respectfully submitted,

JPMORGAN CHASE BANK & CO. AND
CHASE INVESTMENT SERVICES
CORP.

By: s/ Lucy Schwallie
One of Their Attorneys

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Dated: April 2, 2008

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1 through 10, inclusive,)
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PROPOSED ORDER

IT IS HEREBY ORDERED that the Parties' Joint Motion to Stay Proceedings for 21 days is GRANTED. Proceedings will be stayed until Friday, April 25, 2008. It is further ordered that the parties will report to the Court on their progress at the conclusion of the 21-day period and either (1) request an additional stay so that they can continue to pursue settlement discussions, or (2) submit a schedule for the completion of briefing on the pending motion to dismiss.

BY ORDER OF THE COURT

JUDGE CHARLES R. NORGL

By: _____

Dated: _____

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2008, I electronically filed the foregoing Joint Motion to Stay Proceedings with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

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